

DEPARTMENT OF BENEFIT PAYMENTS
44 P Street, Sacramento, CA 95814
(916) 322-3216



January 26, 1977

ALL-COUNTY LETTER NO. 77-4

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: SPECIAL INVESTIGATIVE UNIT SURVEY

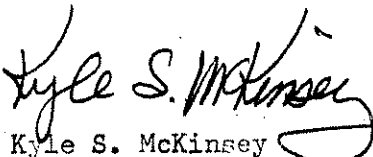
REFERENCE:

As you know, the Department of Benefit Payments has for the past three years vigorously pursued a program designed to eliminate errors in the delivery of welfare benefits. With your help we have achieved significant progress, particularly in the AFDC program wherein \$29 million was saved during the last fiscal year of the program.

However, other quality control aspects of our welfare system are of increasing concern to the department. Our recent study of 19 county Special Investigative Units (SIU) revealed there are substantial variations in resources, procedures, and levels of activity among the counties. This suggests that this important control function may have defects which permit welfare abuse and fraud.

It is the department's intent to develop over the next few months a comprehensive program to improve the welfare fraud investigation, detection and prevention activities throughout the state. We will, of course, need your close cooperation and support.

The next step in the program is to determine, in the remaining counties, the resources and procedures which are now in effect. The attached questionnaire will assist us in compiling this information. We are requesting that those counties which were not included in our recent study (list attached) complete and return the questionnaire by February 7, 1977. This will enable us to complete our inventory and proceed expeditiously with this important program.


Kyle S. McKinsey
Deputy Director

Attachments

INSTRUCTIONS FOR:

Special Investigations Unit (SIU) and Fraud Referral Systems Questionnaire

General: This questionnaire is constructed in seven sections and addresses the following areas: 1) SIU Organization and Staffing, 2) County Intake System and Fraud Prevention Activities, 3) County Fraud Referral Process, 4) Earning Clearance System Organization and Procedures, 5) Collection Unit Activities, 6) Prosecution Referral Process and, 7) County Comments. Dependent on individual county organization and numbers of employees, completion of the questionnaire may require the input of up to four units/persons. The absence of a specific Collections and/or Earnings Clearance Unit can decrease the required input to two units/persons.

Sections 1, 3, and 6 - Supervising Investigator or District Attorneys

Section 2 - AFDC Intake Supervisor

Section 4 - ECS Unit or Supervising Investigator

Section 5 - Collections Unit or Supervising Investigator

Section 7 - As desired.

Reference Person: For questions or clarifications on completing this questionnaire, please call Bruce Kennedy at (916) 445-2154 or ATSS (916) 485-2154 or Ellis Graham at (916) 322-2296 or ATSS (916) 492-2296

Return Instructions: The completed questionnaire and requested attachments, should be completed by February 7, 1977 and mailed to:

Program Review Bureau
Department of Benefit Payments
Mail Station 19-10
744 P Street
Sacramento, CA 95814
Attn: Bruce Kennedy

Completion: The questionnaire attempts, within each section, to be as self explanatory as possible. The general narrative format is designed to be broad enough to allow for expected variance in county systems and organizational arrangement and still enable each county to adequately describe its activities in the addressed areas. If additional space is required for any question, please continue on the reverse side of the page referencing your response by section and question number. If an individual question does not apply, please mark the response area N/A. Please answer all questions that are applicable to reflect the current situation in the county.

County _____

Date of Completion _____

Special Investigation's Unit (SIU)

and

Fraud Referral Systems Questionnaire

I. Special Investigation Unit Organizational Structure

1. How many field investigators does the county welfare department (CWD) or District Attorney's (DA) office have working on welfare fraud investigations?
 - a) Authorized _____
 - b) Actual _____
2. What is the approximate average length of experience of these field investigators with the CWD or DA's office? _____
3. How many supervising investigative staff does the CWD or DA's office have working on welfare fraud investigations?
 - a) Authorized _____
 - b) Actual _____
4. What is the desired and actual background for investigative staff utilized by the CWD or DA's office? (i.e., law enforcement as either a police officer or investigator, eligibility or quality control experience in a county welfare department, law enforcement or criminology as a college major with no experience, etc.)

Desired _____

Actual of present investigative staff _____

5. Is status as a "Peace Officer" authorized for CWD investigative staff?

Yes _____ No _____

a) If authorized, is "Peace Officer" status desired or required?

6. How many eligibility staff are assigned to the Special Investigations Unit performing either investigative or support functions?

Classification	Number	Responsibilities

a) If any eligibility staff are assigned to the SIU:

1) How are they selected? Investigative: _____

Other: _____

2) What is their desired or required background for selection?
(i.e., minimum time in CWD, eligibility work for X years,
minimum class of EW II, work in either a quality control
or intake assignment, etc.)

Investigative: _____

Other: _____

7. List other staff assigned to the SIU. (clerks, secretaries, etc.)

<u>Position Title</u>	<u>Number</u>	<u>Classification Level</u>	<u>Responsibilities</u>

8. What is the title of the organizational unit the SIU reports to and what other activities does this unit oversee? (Enclose an organization chart if possible.)

9. (This question should be answered by these counties which have not placed the SIU function in the DA's office.)

What activities, in addition to the fraud referral and investigation systems, are SIU staff responsible for conducting in the county?

II. CWD Intake System and Fraud Prevention Activities

1. What is the desired and required minimum background for an eligibility worker to be assigned an AFDC intake caseload?

Desired _____

Required _____

2. Can new workers be assigned to "intake"?

Yes _____ No _____

3. What special eligibility training, if any, is provided workers assigned to AFDC intake? (classes, hours, purpose)

- a) If training is provided, is such training completed prior, during or after assuming the caseload?

4. What special training, if any, is provided workers assigned to AFDC intake in the methods and procedures for potential fraud detection, follow-up and referral? (classes, lectures, hours, purpose)

- a) If training is provided, is such training completed prior, during or after assuming the intake caseload? _____

- b) Who provides such training? (SIU staff, eligibility supervisors, quality control staff, etc.) _____

5. What methods do AFDC intake workers utilize to inform AFDC applicants of their rights and responsibilities, county fraud prevention activities and potential penalties? (This can include the provision of pamphlets, verbal briefings, etc.)

6. Do SIU staff participate during the AFDC intake process in any fraud prevention activities?

Yes _____ No _____

- a) If so, who participates? (Investigators, SIU eligibility staff, etc.) _____

- b) What do they do? (Interview applicants individually, make presentations to group application sessions, review the eligibility case, make random/universal home visits, etc.) _____

- c) For what purpose did the county institute such activities, how long have they been in effect and what is the county's evaluation of the effectiveness of these activities? _____

- d) At what point in the AFDC intake process do they become involved? (Prior to signing the CA-2, at initial application, after an eligibility determination has been made, etc.) _____

7. What is the average AFDC intake case load in terms of completed applications per month? _____
- a) What is an estimated or actual range? Min: _____ Max: _____
8. What is county policy on home visits by AFDC intake workers, if they are made at all, in terms of:
- a) What approximate percentage of applicants are visited? _____
- b) What criteria are used to select those applicants that are visited, if only a portion of the caseload receive such visits? (Random selection, presence of specific case characteristic, applicant is physically unable to come to office, etc.) _____
- _____
- _____
- _____
9. Under what circumstances and time frames does a continuing or intake case that has been discontinued by 239 action go through the intake process again? _____
- _____
- _____
- a) Are such cases assigned to special or normal intake workers? _____
- _____
- b) If normal workers, are they accounted for in caseload management planning? How? _____
- _____
- _____
- _____

III. Fraud Referral Process

1. Does the county have written procedures that interpret, define or expand upon the criteria listed in the Eligibility and Assistance Standards Manual (EAS), Division 20, for fraud referral?

Yes _____ No _____

- a) If not, what distribution does the EAS receive in the county? (all workers, eligibility supervisors only, investigators, etc.)

- b) If yes,

- 1) What is the title of the county document in which these procedures are contained? (Attach a copy if possible.)

- 2) What is the distribution of this document? (All workers, eligibility unit supervisors, investigators, etc.)

- 3) If workers do not receive this document, does the special training covered in Section II, Question 4, utilize this document and its procedures? Yes _____ No _____ N/A (no special training is received) _____.

2. When considering whether or not to make a fraud referral, does the worker consider:

- a) The dollar amount of any overpayment or ineligibility resulting from the potential fraud? Yes _____ No _____
What dollar amount results in a referral? _____

- b) The cause of the overpayment or ineligibility? (Unrelated Adult Male misuse of funds, misreporting of earned income, child not in home, etc.) Yes _____ No _____

- c) Are any situations exempted from referral and resolved by alternative methods? (Grant adjustment, discontinuance, etc.)
Yes _____ No _____

If yes:

- 1) What are these situations? (UAM misuse of funds, etc.)

2) What alternatives does the county use to resolve them?

3) Why did the county decide not to refer these cases for fraud investigation and prosecution? _____

3. Prior to making a fraud referral on either suspicion or information received, is the worker responsible for attempting to verify or resolve the discrepancy? Yes _____ No _____

a) If yes, what steps does the worker take prior to making the referral? (Home visit, employer or school checks, phone contact with recipient, etc.) _____

4. How long does the worker have between occurrence and initiation of a fraud referral? _____

5. How is a referral initiated? (Verbally or via county form) _____

(If form, include a copy)

6. How is the referral routed to the SIU? (Example: Worker to supervisor to SIU Unit Clerk to Supervising Investigator to assigned Field Investigator.) _____

a) Is the referral logged by the worker when made and, if so, how is this log maintained? _____

- b) Is the referral logged in at receipt by the SIU and, if so, how is this log maintained and by whom? _____

7. On receipt of a referral at the SIU, is any prioritization or pre-screening of the referrals conducted prior to assignment for investigation or rejection? Yes _____ No _____

- a) If not, how are cases assigned to investigators? (rotating, by geographical area, by type, first in, first out, etc.)

- b) If screening is conducted:

- 1) Who does such screening? (Supervising Investigator, Unit Clerk, etc.) _____

- 2) What criteria does this "screener" use to either accept a case for investigation or return it for other action? _____

- 3) If the case is accepted for investigation, what additional criteria, if any, are used to determine its assignment priority? _____

8. Are there any standardized time frames for the completion of SIU action? Yes _____ No _____

- a) If yes; within these three general categories, what are the standardized time frames?

- 1) Return of a case rejected from investigation to the worker.

2) Completion of a "Priority" case assigned for investigation.

3) Completion of a "Routine" case assigned for investigation.

9. If the referral is accepted for investigation, what feedback, if any, is provided to the eligibility unit or worker? When? How?

10. Does the SIU currently have a backlog of referred cases for investigation? Yes _____ No _____

a) If the SIU does have a backlog, what is the current backlog in numbers of AFDC cases? _____

b) If the SIU has a backlog, how much delay, in months, does this backlog add to the time period between referral and commencement of any investigation? _____

c) If the SIU has a backlog, have different priorities for assignment of referrals been adopted? Yes _____ No _____

1) If yes, has this reprioritization resulted in rejection of some referrals that would normally be accepted? Yes _____
No _____

2) Briefly describe those types of cases that are being rejected due to the existence of the backlog.

IV. Earnings Clearance System Organization and Procedures

1. Is the responsibility for the handling of the Earnings Clearance System assigned to staff within the SIU and listed in Section I?

Yes _____ No _____

- a) If yes, how many and what classification levels if these are not shown in Section I, Question 6? _____

- b) If not, and a special unit exists for this function:

- 1) How many staff are assigned to this function by classification and level? _____

- 2) What is their organizational location? _____

- 3) What formal communications procedures exist between the ECS and SIU staff? _____

- c) If this function is not in the SIU or a special unit, how is it handled? _____

2. What optional quarterly ECS dollar cutoff level does the county utilize for AFDC?

\$1 _____ \$501 _____ \$901 _____

3. Briefly describe the procedures for comparing ECS with recipient reported earnings, verifying discrepancies and referring for investigation. _____

a) Are procedures different for open and closed cases? Yes _____
No _____. If yes, explain. _____

V. Collections

1. If possible, are grant adjustments initiated at the time of the over-payment computation? Yes _____ No _____

a) If yes, by whom? _____

b) If no, when are they? By whom? _____

2. Who has the responsibility for collections within the county?

a) Where is the collections unit organizationally located?

b) By what process does an "accounts receivable" reach the collections unit? (Direct from investigator via form, via the ECS unit, etc.)

c) Describe normal collection activities taken on receipt of an "accounts receivable." _____

VI. Prosecution Referral Process

1. Does the DA have any policies or procedures governing acceptance of referrals for prosecution? Yes _____ No _____

a) If yes, describe these. _____

- b) Are these policies formal and written? Yes _____ No _____
If yes, please attach copy.)

2. For completed investigations that meet any existent DA criteria, who (title) recommends/makes the actual referral?

Recommends _____

Refers _____

3. What criteria are considered in the determination to refer a case for prosecution? (Recipient understanding, dollar amounts, types of referral, etc.) _____

4. Does a request for a fair hearing, or fair hearing decision, affect the decision to refer for prosecution? Yes _____ No _____

a) If yes, describe _____

VII. County Comments

This section is reserved for general county comments, further explanation of items in the questionnaire, or program improvement suggestions.

Designated county contact person for questions regarding this questionnaire.

Name _____

Title _____

Phone # () _____

Attachment II

Counties Not Reviewed During the
Special Investigation Unit Operations Review

Alpine	Madera	Santa Cruz
Amador	Marin	Sierra
Butte	Mariposa	Siskiyou
Calaveras	Merced	Solano
Colusa	Modoc	Sonoma
Del Norte	Mono	Stanislaus
El Dorado	Napa	Sutter
Glenn	Nevada	Tehama
Imperial	Placer	Trinity
Inyo	Plumas	Tulare
Kings	San Benito	Tuolumne
Lake	San Luis Obispo	Yolo
Lassen	Santa Barbara	Yuba